

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

PSN ILLINOIS, LLC, an Illinois corporation,	)	
	)	
plaintiff,	)	
	)	Case No. 07 CV 7190
v.	)	
	)	Judge William J. Hibbler
ABCAM, INC. et al.,	)	
	)	Magistrate Judge Valdez
defendants.	)	

**MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION AND  
FOR IMPROPER VENUE**

The defendant, LifeSpan BioSciences, Inc., by its undersigned attorney, moves this Court to dismiss this case as to LifeSpan for lack of personal jurisdiction, to dismiss for improper venue, or to transfer venue, and in support thereof states:

1. This matter is a patent infringement lawsuit.
2. LifeSpan is not a resident of this district and is not subject to personal jurisdiction in this district. LifeSpan does not have minimum contacts sufficient to confer general or specific jurisdiction in this district.
3. Additionally, venue is improper in this district as to LifeSpan. LifeSpan is not a resident of this district, being a Washington corporation and not subject to personal jurisdiction in this district. Moreover, the acts alleged to be patent infringement in this case did not occur in this district and LifeSpan does not have a regular and established place of business in this district.

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4. LifeSpan submits a Declaration of James W. Shepperd, Chief Financial Officer of LifeSpan, in support of this Motion. LifeSpan also concurrently submits a Brief in support of this Motion.

5. LifeSpan properly preserved these defenses in its Answer to the Complaint.

WHEREFORE, the defendant, LifeSpan BioSciences, Inc., moves this Court to:

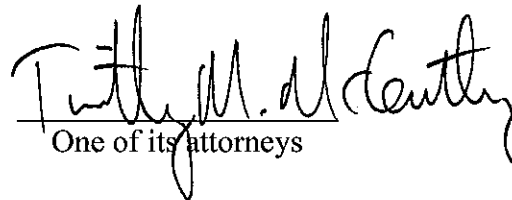
1. Dismiss this case as to LifeSpan for lack of personal jurisdiction; or
2. Dismiss this case as to LifeSpan for lack of proper venue; or
3. Sever LifeSpan from this case and transfer this case to the United States District Court for the Western District of Washington.

Respectfully submitted,

LIFESPAN BIOSCIENCES, INC.

Date: April 29, 2008

By:

  
One of its attorneys

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**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing **MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION AND FOR IMPROPER VENUE** and **NOTICE OF PRESENTMENT** has been served on the following counsel, by email and by telefacsimile, on April 29, 2008.

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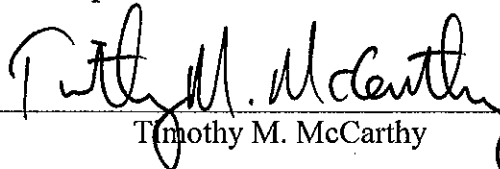
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Date: April 29, 2008

By: \_\_\_\_\_

  
Timothy M. McCarthy

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